

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

IRONWORKS PATENTS, LLC,

Plaintiff,

v.

ONEPLUS TECHNOLOGY
(SHENZHEN) CO., LTD.

Defendant.

Case No. 6:20-cv-252

COMPLAINT FOR PATENT
INFRINGEMENT AND
JURY TRIAL DEMANDED

COMPLAINT

Plaintiff Ironworks Patents LLC (“Ironworks” or “Plaintiff”) files this Complaint for patent infringement under the patent laws of the United States, Title 35 of the United States Code, against Defendant OnePlus Technology (Shenzhen) Co., Ltd. (“OnePlus” or “Defendant”) that relates to three U.S. patents owned by Ironworks: 6,850,150; 8,847,734; and 9,521,269 (collectively, the “Patents-in-Suit”).

PARTIES

1. Plaintiff Ironworks is a limited liability company organized under the laws of the State of Illinois, with an office at 125 S. Clark St., 17th Floor, Chicago, Illinois 60603.

2. Defendant OnePlus is a corporation duly organized and existing under the laws of China, with its principal place of business at 18F, Tairan Building, Block C, Tairan 8th Road, Chegongmiao, Futian District Shenzhen, Guangdong, 518040, China. On information and belief, OnePlus can be served with process at that address.

3. OnePlus makes, uses, imports, sells and offers for sale wireless mobile devices, including smartphones.

4. OnePlus is ranked by independent industry analysts as a top-five phone manufacturer in the United States.

JURISDICTION AND VENUE

5. This is a civil action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. § 1, *et seq.*, and more particularly 35 U.S.C. § 271.

6. This Court has jurisdiction over the subject matter of this action under 28 U.S.C. §§ 1331 and 1338(a).

7. Defendant OnePlus is subject to this Court's general personal jurisdiction due at least to its substantial business conducted in this District, including: its place of business (national repair center) at 3918 Range Rd Ste B, Temple, Texas 76504. In addition, OnePlus has solicited business in the State of Texas, transacted business within the State of Texas and attempted to derive financial benefit from residents of the State of Texas in this District, including benefits directly related to the instant patent infringement causes of action set forth herein; (ii) having placed its products and services into the stream of commerce throughout the United States and having been actively engaged in transacting business in Texas and in this District, and (iii) having committed the complained of tortious acts in Texas and in this District.

8. OnePlus, directly and/or through subsidiaries and agents (including distributors, retailers, and others), makes, imports, ships, distributes, offers for sale, sells, uses, and advertises (including offering products and services through its website, <https://www.oneplus.com>, as well as other retailers) its products and/or services in the United States, the State of Texas, and the Western District of Texas.

9. OnePlus, directly and/or through its subsidiaries and agents (including distributors, retailers, and others), has purposefully and voluntarily placed one or more of its infringing products

and/or services, as described below, into the stream of commerce with the expectation that they will be purchased and used by consumers in the Western District of Texas. These infringing products and/or services have been and continue to be purchased and used by consumers in the Western District of Texas. OnePlus has committed acts of patent infringement within the State of Texas and, more particularly, within the Western District of Texas.

10. Venue is proper in this District under 28 U.S.C. §§ 1391 (b) and (c) and 1400(b). Defendant is subject to personal jurisdiction in this District, has transacted business in this District, and has committed acts of patent infringement in this District.

11. Venue is proper as to OnePlus, which is organized under the laws of China, under 28 U.S.C. § 1391(c)(3), which provides that “a defendant not resident in the United States may be sued in any judicial district, and the joinder of such a defendant shall be disregarded in determining where the action may be brought with respect to other defendants.”

BACKGROUND FACTS REGARDING THE IRONWORKS PATENTS

12. Ironworks is the owner of record and assignee of each of U.S. Patent Nos. 6,850,150 (“the ’150 Patent”); 8,847,734 (“the ’734 Patent”); and 9,521,269 (“the ’269 Patent”) (collectively the “Patents-in-Suit”).

13. The ’150 Patent was originally filed by, and assigned to, Nokia Mobile Devices Ltd. (“Nokia”). The ’734 Patent is a continuation of the ’150 Patent and the ’269 Patent is a continuation the ’734 Patent.

14. Nokia is a Finnish multinational communications and information technology company, and at one time was the world’s largest producer of mobile phones.

15. For example, the world’s first mobile phone satellite call was made on a Nokia phone.

16. For more than 20 years, Nokia has defined many of the fundamental technologies used in virtually all mobile devices and taken a leadership role in standards setting. As a result, Nokia owns a leading share of essential patents for GSM, 3G radio and 4G LTE technologies. These, together with other Nokia patents for Wi-Fi and video standards, form the core of Nokia's patent portfolio.

17. Between 1984 and 2014, Nokia has invested more than 50 billion Euros to create a portfolio of 30,000 patents and patent applications. Nokia's long history of innovation has resulted in the company being awarded more than 30,000 patents in more than 10,000 patent families.

THE PATENTS-IN-SUIT AND CLAIMS-IN-SUIT

18. Ironworks has the exclusive right to sue and the exclusive right to recover damages for infringement of the Patents-in-Suit during all relevant time periods.

19. On February 1, 2005, the '150 Patent entitled "Portable Device" was duly and legally issued by the USPTO.

20. On September 30, 2014, the '734 Patent entitled "Method of giving the user information, portable device, and computer program product" was duly and legally issued by the USPTO.

21. On December 13, 2016, the '269 Patent entitled "Method of giving the user information and portable device" was duly and legally issued by the USPTO.

ONEPLUS'S INFRINGING PRODUCTS

22. OnePlus has been, and now is, directly infringing claims of the Patents-in-Suit under 35 U.S.C. § 271(a) by making, using, offering for sale, selling, and/or importing the below accused smartphones and other mobile wireless devices in this District and elsewhere in the United States that include the systems claimed in the Patents-in-Suit.

23. OnePlus has been and now is inducing the direct infringement of claims of the Patents-in-Suit pursuant to U.S.C. § 271(b) at least by one or more of making, using, offering for sale, selling and/or importing the below accused smartphones in this District and elsewhere in the United States that were designed and intended to be covered by the Patents-in-Suit. Further, OnePlus has induced infringement by, for example, providing user guides and other support materials and services to its users and by advertising features that are used, and benefits that are achieved through use of the Patents-in-Suit.

24. Despite OnePlus's awareness of the Patents-in-Suit, OnePlus has continued these acts of inducement with specific intent to cause and encourage direct infringement of the Patents-in-Suit with willful blindness that such activities occurred, are still occurring, and constitute direct infringement of the Patents-in-Suit.

**ONEPLUS'S KNOWLEDGE OF THE PATENTS-IN-SUIT
AND CONTINUED INFRINGEMENT DESPITE THAT KNOWLEDGE**

25. The Patents-in-Suit were previously owned by MobileMedia Ideas, LLC ("MMI"). MMI assigned the Patents-in-Suit to Ironworks in March 2017.

26. On May 23, 2019, counsel for Ironworks sent a letter to Mr. Bingo Hu, Legal Director of OnePlus Technology Co. Ltd

27. The letter provided background information on the Ironworks patent portfolio, including specific information about the Patents-in-Suit.

28. Counsel for Ironworks also provided claim charts that detailed OnePlus' infringement of the Patents-in-Suit.

29. To Ironworks' knowledge, OnePlus never raised any non-infringement defense related to any of the Patents-in-Suit and never raised any prior art issues related to any of the Patents-in-Suit.

30. OnePlus has not agreed to enter into a licensing agreement with MMI or Ironworks.

31. This Complaint serves as additional notice to OnePlus of the Patents-in-Suit and the manner in which they are infringed.

32. Despite knowledge of the Patents-in-Suit and knowledge of the manner in which the Patents-in-Suit are infringed as demonstrated in the provided claim charts, OnePlus has continued to infringe, and/or induce the infringement of, the Patents-in-Suit.

COUNT I: INFRINGEMENT OF U.S. PAT. 6,850,150 CLAIM 1

33. Ironworks Patents incorporates by reference the allegations set forth in paragraphs 1 to 32 of this Complaint as though set forth in full herein.

34. Claim 1 of the '150 Patent provides:

Preamble to Claim 1	A portable device, comprising:
Element A	control means for monitoring and controlling the operation of the device;
Element B	and a user interface which comprises alarm means for performing a silent alarm producing a silent, invisible, tactile sensation in the user;
Element C	wherein the control means are arranged to give the user abstract information on multiple internal operational events of the device by using various alarm patterns of silent, invisible sensations produced by the alarm means and sensed by the user,
Element D	the alarm patterns differing from one another such that at least one alarm pattern characteristic sensed by the user varies, said abstract information comprising a notification of a selected item on a menu of the user interface.

35. Defendant makes, uses, sells, offers for sale, and/or imports wireless mobile devices, including mobile smartphones that are mobile stations (“Accused ’150 OnePlus Devices”). Accused ’150 OnePlus Devices include, for example, at least OnePlus One, 2, X, 3, 3T, 5, 5T, 6, 6T, 7, 7 Pro, 7T, and 7T Pro devices.

36. Defendant has and continues to make, use, sell, import, and/or offer for sale the Accused '150 OnePlus Devices that meet each and every element of claim 1 of the '150 Patent.

37. Accused '150 OnePlus Devices are portable devices as described in this claim.

38. Accused '150 OnePlus Devices include a control means (e.g., a microprocessor with operating system software) for monitoring and controlling the operation of the device.

39. Accused '150 OnePlus Devices include a user interface, which includes alarm means (e.g., a vibration motor) for performing a silent alarm producing a silent, invisible, tactile sensation (e.g., vibration) in the user.

40. Accused '150 OnePlus Devices' microprocessor and operating system are arranged to give the user abstract information on multiple internal operational events of the device by using various vibration patterns produced by the vibration motor and sensed by the user.

41. Accused '150 OnePlus Devices' vibration patterns differ from one another so that the vibration characteristics sensed by the user varies.

42. The various vibration patterns give OnePlus device users abstract information on internal operational events of the device, including a notification of a selected item on a menu of the user interface.

43. The technology claimed in claim 1 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

44. Defendant had knowledge of the '150 Patent since at least May 2019.

45. Defendant directly infringes at least claim 1 of the '150 Patent by manufacturing and selling Accused '150 OnePlus Devices.

46. Defendant makes, uses, and/or imports the Accused '150 OnePlus Devices knowing that Defendant has infringed and continues to infringe at least claim 1 of the '150 Patent under 35 U.S.C. § 271(a) directly.

47. As a direct and proximate result of Defendant's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT II: INFRINGEMENT OF U.S. PAT. 6,850,150 CLAIM 2

48. Ironworks reasserts and realleges paragraphs 1 through 47 of this Complaint as though set forth fully here.

49. Claim 2 of the '150 Patent provides:

Element A	A portable device as claimed in claim 1, wherein the alarm means are a vibrating alarm.
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50. Defendant makes, uses, sells, offers for sale, and/or imports the Accused '150 OnePlus Devices that meet each and every element of claim 2 of the '150 Patent.

51. Accused '150 OnePlus Devices include alarm means that are a vibrating alarm.

52. The technology claimed in claim 2 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

53. Defendant had knowledge of the '150 Patent since at least May 2019.

54. Defendant directly infringes at least claim 2 of the '150 Patent by manufacturing and selling Accused '150 OnePlus Devices.

55. As a direct and proximate result of Defendant's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT III: INFRINGEMENT OF U.S. PAT. 6,850,150 CLAIM 10

56. Ironworks reasserts and realleges paragraphs 1 through 55 of this Complaint as though set forth fully here.

57. Claim 10 of the '150 Patent provides:

Element A	A portable device as claimed in claim 1, wherein the portable device is a subscriber terminal in a telecommunication system.
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58. Defendant makes, uses, sells, offers for sale, and/or imports the Accused '150 OnePlus Devices that meet each and every element of claim 10 of the '150 Patent.

59. Accused '150 OnePlus Devices are subscriber terminals in a telecommunication system.

60. The technology claimed in claim 10 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

61. Defendant had knowledge of the '150 Patent since at least May 2019.

62. Defendant directly infringes at least claim 10 of the '150 Patent by manufacturing and selling Accused '150 OnePlus Devices.

63. As a direct and proximate result of Defendant's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT IV: INFRINGEMENT OF PAT. 8,847,734 CLAIM 1

64. Ironworks Patents incorporates by reference the allegations set forth in paragraphs 1 to 63 of this Complaint as though set forth in full herein.

65. Claim 1 of the '734 Patent provides:

Preamble to Claim 1	A mobile station comprising:
Element A	a user interface configured to enable a user to control operation of the mobile station by manual input and to obtain information on the operation of the mobile station,
Element B	a tactile alert device configured to generate a tactile vibration, and
Element C	a control circuit configured to control the tactile alert device to generate a first tactile vibration with a first pattern in response to a first event and a second tactile vibration with a second pattern that is distinctly humanly perceptibly different from the first pattern in response to a second event different from the first event,
Element D	wherein one of the events is user entry of an incorrect personal identification number code.

66. OnePlus makes, uses, sells, offers for sale, and/or imports wireless mobile devices, including mobile smartphones that are mobile stations (“Accused ’734 OnePlus Devices”). Accused ’734 OnePlus Devices include, for example, at least OnePlus One, 2, X, 3, 3T, 5, 5T, 6, 6T, 7, 7 Pro, 7T, and 7T Pro devices that vibrate when an incorrect PIN or passcode is entered.

67. Accused ’734 OnePlus Devices are mobile stations as described in this claim.

68. Accused ’734 OnePlus Devices include a user interface that is configured to enable a user to control operation of the mobile station by manual input (e.g., touching the touchscreen) and to obtain information on the operation of the mobile station (e.g., when a phone call is incoming).

69. Accused ’734 OnePlus Devices include a tactile alert device (e.g., a vibration motor) configured to generate a tactile vibration.

70. Accused ’734 OnePlus Devices include a control circuit configured to control the tactile alert device. The tactile alert device can generate a first tactile vibration with a first pattern in response to a first event (e.g., an incoming call) and a second tactile vibration with a second

pattern that is distinctly humanly perceptibly different from the first pattern in response to a second event (e.g., entry of an incorrect PIN).

71. Accused '734 OnePlus Devices vibrate when an incorrect personal identification number code (e.g., passcode) has been entered.

72. The technology claimed in claim 1 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

73. OnePlus had knowledge of the '734 Patent since at least May 2019.

74. OnePlus directly infringes at least claim 1 of the '734 Patent by manufacturing and selling Accused '734 OnePlus Devices.

75. OnePlus makes, uses, and/or imports the Accused '734 OnePlus Devices knowing that OnePlus has infringed and continues to infringe at least claim 1 of the '734 Patent under 35 U.S.C. § 271(a) directly.

76. As a direct and proximate result of OnePlus's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT V: INFRINGEMENT OF PAT. 8,847,734 CLAIM 2

77. Ironworks Patents incorporates by reference the allegations set forth in paragraphs 1 to 76 of this Complaint as though set forth in full herein.

78. Claim 2 of the '734 Patent provides:

Element A	The mobile station of claim 1 wherein the mobile station is a mobile telephone.
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79. OnePlus makes, uses, sells, offers for sale, and/or imports the Accused '734 OnePlus Devices that meet each and every element of claim 2 of the '734 Patent.

80. Accused '734 OnePlus Devices are mobile telephones.

81. The technology claimed in claim 2 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

82. OnePlus had knowledge of the '734 Patent since at least May 2019.

83. OnePlus directly infringes at least claim 2 of the '734 Patent by manufacturing and selling Accused '734 OnePlus Devices.

84. As a direct and proximate result of OnePlus's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT VI: INFRINGEMENT OF PAT. 8,847,734 CLAIM 3

85. Ironworks Patents incorporates by reference the allegations set forth in paragraphs 1 to 84 of this Complaint as though set forth in full herein.

86. Claim 3 of the '734 Patent provides:

Preamble to Claim 3	The mobile station of claim 1 further comprising:
Element A	a transceiver for generating a transmitted signal and handling a received signal, and
Element B	an antenna coupled to the transceiver for receiving a wireless signal and for transmitting a wireless signal.

87. OnePlus makes, uses, sells, offers for sale, and/or imports the Accused '734 OnePlus Devices that meet each and every element of claim 3 of the '734 Patent.

88. Accused '734 OnePlus Devices include a transceiver for generating a transmitted signal and handling a received signal, and an antenna coupled to the transceiver for receiving a

wireless signal and for transmitting a wireless signal.

89. The technology claimed in claim 3 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

90. OnePlus had knowledge of the '734 Patent since at least May 2019.

91. OnePlus directly infringes at least claim 3 of the '734 Patent by manufacturing and selling Accused '734 OnePlus Devices.

92. As a direct and proximate result of OnePlus's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT VII: INFRINGEMENT OF PAT. 8,847,734 CLAIM 4

93. Ironworks Patents incorporates by reference the allegations set forth in paragraphs 1 to 92 of this Complaint as though set forth in full herein.

94. Claim 4 of the '734 Patent provides:

Element A	The mobile station of claim 1 further comprising a battery for supplying power to the mobile station.
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95. OnePlus makes, uses, sells, offers for sale, and/or imports the Accused '734 OnePlus Devices that meet each and every element of claim 4 of the '734 Patent.

96. Accused '734 OnePlus Devices include a battery for supplying power to the mobile station.

97. The technology claimed in claim 4 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

98. OnePlus had knowledge of the '734 Patent since at least May 2019.

99. OnePlus directly infringes at least claim 4 of the '734 Patent by manufacturing and selling Accused '734 OnePlus Devices.

100. As a direct and proximate result of OnePlus's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT VIII: INFRINGEMENT OF PAT. 8,847,734 CLAIM 5

101. Ironworks Patents incorporates by reference the allegations set forth in paragraphs 1 to 100 of this Complaint as though set forth in full herein.

102. Claim 5 of the '734 Patent provides:

Preamble to Claim 5	The mobile station of claim 1 wherein the user interface further comprises:
Element A	a flat panel display,
Element B	a microphone configured to receive speech to be transmitted,
Element C	a loudspeaker configured to generate sounds,
Element D	a camera, and
Element E	a circuit configured to receive manual input of a user for manually controlling the operation of the mobile station.

103. OnePlus makes, uses, sells, offers for sale, and/or imports the Accused '734 OnePlus Devices that meet each and every element of claim 5 of the '734 Patent.

104. Accused '734 OnePlus Devices include a flat panel display, a microphone configured to receive speech to be transmitted, a loudspeaker configured to generate sounds, a camera, and a circuit configured to receive manual input of a user for manually controlling the operation of the mobile station.

105. The technology claimed in claim 5 was not well understood, routine, or

conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

106. OnePlus had knowledge of the '734 Patent since at least May 2019.

107. OnePlus directly infringes at least claim 5 of the '734 Patent by manufacturing and selling Accused '734 OnePlus Devices.

108. As a direct and proximate result of OnePlus's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT IX: INFRINGEMENT OF PAT. 8,847,734 CLAIM 6

109. Ironworks Patents incorporates by reference the allegations set forth in paragraphs 1 to 108 of this Complaint as though set forth in full herein.

110. Claim 6 of the '734 Patent provides:

Preamble to Claim 6	The mobile station of claim 1 wherein the control circuit further comprises:
Element A	a microprocessor, and
Element B	software executed by the microprocessor.

111. OnePlus makes, uses, sells, offers for sale, and/or imports the Accused '734 OnePlus Devices that meet each and every element of claim 6 of the '734 Patent.

112. Accused '734 OnePlus Devices include a control circuit, which includes a microprocessor, and software executed by the microprocessor.

113. The technology claimed in claim 6 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

114. OnePlus had knowledge of the '734 Patent since at least May 2019.

115. OnePlus directly infringes at least claim 6 of the '734 Patent by manufacturing and selling Accused '734 OnePlus Devices.

116. As a direct and proximate result of OnePlus's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT X: INFRINGEMENT OF PAT. 8,847,734 CLAIM 7

117. Ironworks Patents incorporates by reference the allegations set forth in paragraphs 1 to 116 of this Complaint as though set forth in full herein.

118. Claim 7 of the '734 Patent provides:

Element A	The mobile station of claim 1 where the control circuit is configured to monitor and control operation of the mobile station, to monitor and control the operation of the user interface and to control the operation of the tactile alert device.
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119. OnePlus makes, uses, sells, offers for sale, and/or imports the Accused '734 OnePlus Devices that meet each and every element of claim 7 of the '734 Patent.

120. Accused '734 OnePlus Devices include a control circuit configured to monitor and control operation of the mobile station, to monitor and control the operation of the user interface, and to control the operation of the tactile alert device.

121. The technology claimed in claim 7 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

122. OnePlus had knowledge of the '734 Patent since at least May 2019.

123. OnePlus directly infringes at least claim 7 of the '734 Patent by manufacturing and selling Accused '734 OnePlus Devices.

124. As a direct and proximate result of OnePlus's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT XI: INFRINGEMENT OF U.S. PAT. 9,521,269 CLAIM 1

125. Ironworks reasserts and realleges paragraphs 1 through 124 of this Complaint as though set forth fully here.

126. Claim 1 of the '269 Patent provides:

Preamble to Claim 1	A mobile station comprising:
Element A	a user interface configured to enable a user to control operation of the mobile station by manual input and to obtain information on the operation of the mobile station,
Element B	a tactile alert device configured to generate a tactile vibration, and
Element C	a control circuit configured to control the tactile alert device to generate a first tactile vibration with a first pattern in response to a first event and a second tactile vibration with a second pattern that is distinctly humanly perceptibly different from the first pattern in response to a second event different from the first event,
Element D	wherein the first event is correct user manual input.

127. Defendant makes, uses, sells, offers for sale, and/or imports wireless mobile devices, including mobile smartphones that are mobile stations ("Accused '269 OnePlus Devices"). The Accused '269 OnePlus Devices include, for example, at least OnePlus One, 2, X, 3, 3T, 5, 5T, 6, 6T, 7, 7 Pro, 7T, and 7T Pro devices.

128. Defendant has and continues to make, use, sell, import, and/or offer for sale the Accused '269 OnePlus Devices that meet each and every element of claim 1 of the '269 Patent.

129. Accused '269 OnePlus Devices are mobile stations.

130. Accused '269 OnePlus Devices include a user interface configured to enable a user to control operation of the mobile station by manual input and to obtain information on the operation of the mobile station.

131. Accused '269 OnePlus Devices include a tactile alert device (e.g., a vibration motor) configured to generate a tactile vibration.

132. Accused '269 OnePlus Devices include a control circuit configured to control the tactile alert device to generate a first tactile vibration with a first pattern in response to a first event (e.g., a fingerprint scan) and a second tactile vibration with a second pattern that is distinctly humanly perceptibly different from the first pattern in response to a second event (e.g., an incoming phone call) different from the first event.

133. The first event is correct user manual input.

134. The technology claimed in claim 1 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

135. OnePlus had knowledge of the '269 Patent since at least May 2019.

136. Defendant directly infringes at least claim 1 of the '269 Patent by manufacturing and selling Accused '269 OnePlus Devices.

137. Defendant makes, uses, and/or imports the Accused '269 OnePlus Devices knowing that Defendant has infringed and continues to infringe at least claim 1 of the '269 Patent under 35 U.S.C. § 271(a) directly.

138. As a direct and proximate result of Defendant's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT XII: INFRINGEMENT OF U.S. PAT. 9,521,269 CLAIM 5

139. Ironworks reasserts and realleges paragraphs 1 through 138 of this Complaint as though set forth fully here.

140. Claim 5 of the '269 Patent provides:

Element A	The mobile station of claim 1, wherein the second event is an incoming call.
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141. Defendant makes, uses, sells, offers for sale, and/or imports the Accused '269 OnePlus Devices that meet each and every element of claim 5 of the '269 Patent.

142. Accused '269 OnePlus Devices generate a second tactile vibration with a second pattern in response to an incoming call.

143. The technology claimed in claim 5 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

144. OnePlus had knowledge of the '269 Patent since at least May 2019.

145. Defendant directly infringes at least claim 5 of the '269 Patent by manufacturing and selling Accused '269 OnePlus Devices.

146. As a direct and proximate result of Defendant's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT XIII: INFRINGEMENT OF U.S. PAT. 9,521,269 CLAIM 9

147. Ironworks reasserts and realleges paragraphs 1 through 146 of this Complaint as though set forth fully here.

148. Claim 9 of the '269 Patent provides:

Element A	The mobile station of claim 1, wherein the mobile station is a mobile
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	telephone.
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149. Defendant makes, uses, sells, offers for sale, and/or imports the Accused '269 OnePlus Devices that meet each and every element of claim 9 of the '269 Patent.

150. Accused '269 OnePlus Devices are mobile telephones.

151. The technology claimed in claim 9 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

152. OnePlus had knowledge of the '269 Patent since at least May 2019.

153. Defendant directly infringes at least claim 9 of the '269 Patent by manufacturing and selling Accused '269 OnePlus Devices.

154. As a direct and proximate result of Defendant's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT XIV: INFRINGEMENT OF U.S. PAT. 9,521,269 CLAIM 10

155. Ironworks reasserts and realleges paragraphs 1 through 154 of this Complaint as though set forth fully here.

156. Claim 10 of the '269 Patent provides:

Preamble to Claim 10	The mobile station of claim 1 further comprising:
Element A	a transceiver configured to generate a transmitted signal and to handle a received signal, and
Element B	an antenna coupled to the transceiver and configured to receive a first wireless signal as the received signal and to transmit the transmitted signal as a second wireless signal.

157. Defendant makes, uses, sells, offers for sale, and/or imports the Accused '269

OnePlus Devices that meet each and every element of claim 10 of the '269 Patent.

158. Accused '269 OnePlus Devices include a transceiver configured to generate a transmitted signal and to handle a received signal.

159. Accused '269 OnePlus Devices include an antenna coupled to the transceiver and configured to receive a first wireless signal as the received signal and to transmit the transmitted signal as a second wireless signal.

160. The technology claimed in claim 10 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

161. OnePlus had knowledge of the '269 Patent since at least May 2019.

162. Defendant directly infringes at least claim 10 of the '269 Patent by manufacturing and selling Accused '269 OnePlus Devices.

163. As a direct and proximate result of Defendant's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT XV: INFRINGEMENT OF U.S. PAT. 9,521,269 CLAIM 11

164. Ironworks reasserts and realleges paragraphs 1 through 163 of this Complaint as though set forth fully here.

165. Claim 11 of the '269 Patent provides:

Element A	The mobile station of claim 1 further comprising a battery configured to supply power to the mobile station.
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166. Defendant makes, uses, sells, offers for sale, and/or imports the Accused '269 OnePlus Devices that meet each and every element of claim 11 of the '269 Patent.

167. Accused '269 OnePlus Devices include a battery configured to supply power to the

mobile station.

168. The technology claimed in claim 11 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

169. OnePlus had knowledge of the '269 Patent since at least May 2019.

170. Defendant directly infringes at least claim 11 of the '269 Patent by manufacturing and selling Accused '269 OnePlus Devices.

171. As a direct and proximate result of Defendant's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT XVI: INFRINGEMENT OF U.S. PAT. 9,521,269 CLAIM 12

172. Ironworks reasserts and realleges paragraphs 1 through 171 of this Complaint as though set forth fully here.

173. Claim 12 of the '269 Patent provides:

Preamble to Claim 12	The mobile station of claim 1, wherein the user interface comprises:
Element A	a flat panel display,
Element B	a microphone configured to receive speech to be transmitted,
Element C	a loudspeaker configured to generate sounds,
Element D	a camera, and
Element E	a circuit configured to receive manual input of a user for manually controlling the operation of the mobile station.

174. Defendant makes, uses, sells, offers for sale, and/or imports the Accused '269 OnePlus Devices that meet each and every element of claim 12 of the '269 Patent.

175. The user interfaces of the Accused '269 OnePlus Devices include a flat panel display, a microphone configured to receive speech to be transmitted, a loudspeaker configured to generate sounds, a camera, and a circuit configured to receive manual input of a user for manually controlling the operation of the mobile station.

176. The technology claimed in claim 12 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

177. OnePlus had knowledge of the '269 Patent since at least May 2019.

178. Defendant directly infringes at least claim 12 of the '269 Patent by manufacturing and selling Accused '269 OnePlus Devices.

179. As a direct and proximate result of Defendant's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT XVII: INFRINGEMENT OF U.S. PAT. 9,521,269 CLAIM 13

180. Ironworks reasserts and realleges paragraphs 1 through 179 of this Complaint as though set forth fully here.

181. Claim 13 of the '269 Patent provides:

Preamble to Claim 13	The mobile station of claim 1, wherein the control circuit further comprises:
Element A	a microprocessor, and
Element B	software executed by the microprocessor.

182. Defendant makes, uses, sells, offers for sale, and/or imports the Accused '269 OnePlus Devices that meet each and every element of claim 13 of the '269 Patent.

183. The control circuits of the Accused '269 OnePlus Devices include a microprocessor and software executed by the microprocessor.

184. The technology claimed in claim 13 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

185. OnePlus had knowledge of the '269 Patent since at least May 2019.

186. Defendant directly infringes at least claim 13 of the '269 Patent by manufacturing and selling Accused '269 OnePlus Devices.

187. As a direct and proximate result of Defendant's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT XVIII: INFRINGEMENT OF U.S. PAT. 9,521,269 CLAIM 17

188. Ironworks reasserts and realleges paragraphs 1 through 187 of this Complaint as though set forth fully here.

189. Claim 17 of the '269 Patent provides:

Element A	The mobile station of claim 1, wherein the first vibration provides user feedback at the time that the first event has occurred.
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190. Defendant makes, uses, sells, offers for sale, and/or imports the Accused '269 OnePlus Devices that meet each and every element of claim 17 of the '269 Patent.

191. Accused '269 OnePlus Devices generate the first vibration, which provides user feedback at the time that the first event has occurred.

192. The technology claimed in claim 17 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

193. OnePlus had knowledge of the '269 Patent since at least May 2019.

194. Defendant directly infringes at least claim 17 of the '269 Patent by manufacturing and selling Accused '269 OnePlus Devices.

195. As a direct and proximate result of Defendant's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to sustain damages.

COUNT XIX: INFRINGEMENT OF U.S. PAT. 9,521,269 CLAIM 18

196. Ironworks reasserts and realleges paragraphs 1 through 195 of this Complaint as though set forth fully here.

197. Claim 18 of the '269 Patent provides:

Element A	The mobile station of claim 1, wherein the first event is correct user manual input at the user interface.
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198. Defendant makes, uses, sells, offers for sale, and/or imports the Accused '269 OnePlus Devices that meet each and every element of claim 18 of the '269 Patent.

199. Accused '269 OnePlus Devices generate a tactile vibration in response to correct user manual input at the user interface.

200. The technology claimed in claim 18 was not well understood, routine, or conventional at the time that the application was filed and provided a technological solution to a technological problem rooted in computer technology.

201. OnePlus had knowledge of the '269 Patent since at least May 2019.

202. Defendant directly infringes at least claim 18 of the '269 Patent by manufacturing and selling Accused '269 OnePlus Devices.

203. As a direct and proximate result of Defendant's acts of patent infringement, Ironworks Patents has been and continues to be injured and has sustained and will continue to

sustain damages.

WILLFUL INFRINGEMENT

204. OnePlus has infringed and continues to infringe the above identified claims of each of the Patents-in-Suit despite its knowledge of the '150, '734, and '269 Patents and how OnePlus devices infringe claims of those Patents since at least as early as May 2019 and despite the objectively high likelihood that its actions constitute patent infringement.

205. OnePlus's infringement of the Patents-in-Suit is willful and deliberate and its actions constitute egregious misconduct, including refusing to take a license, refusing to negotiate in good faith, and having knowledge of the Patents-in-Suit and notice of the infringement but having no reasonable factual basis for non-infringement or invalidity. This willful misconduct by OnePlus entitles Ironworks to enhanced damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

JURY DEMAND

Ironworks demands a trial by jury on all issues that may be so tried.

REQUEST FOR RELIEF

WHEREFORE, Plaintiff Ironworks requests that this Court enter judgment in its favor and against Defendant OnePlus as follows:

A. Adjudging, finding, and declaring that OnePlus has infringed the above-identified claims of each of the Patents-in-Suit under 35 U.S.C. § 271;

B. Awarding the past and future damages arising out of OnePlus's infringement of the Patents-in-Suit to Ironworks in an amount no less than a reasonable royalty, together with prejudgment and post-judgment interest, in an amount according to proof;

- C. Adjudging, finding, and declaring that OnePlus's infringement is willful and awarding enhanced damages and fees as a result of that willfulness under 35 U.S.C. § 284;
- D. Adjudging, finding, and declaring that the Patents-in-Suit are valid and enforceable;
- E. Awarding attorney's fees, costs, or other damages pursuant to 35 U.S.C. §§ 284 or 285 or as otherwise permitted by law; and
- F. Granting Ironworks such other further relief as is just and proper, or as the Court deems appropriate.

DATED: March 31, 2020

Respectfully submitted,

/s/ Alison Aubry Richards

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